Proposal Regarding SPP Regional Training
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Recommendation for Providing SPP Regional Training for Members

Introduction:
The North American Electric Reliability Council requires personnel responsible for the operation of the electrical grid to obtain 32 hours of emergency operations training annually and, in addition, to maintain Operator certification required by NERC, Operators must obtain up to 200 hours of training over three years which includes simulation training. It is critical that the SPP develop training elements to provide knowledge and operating practice in support of the emergency operating plans for the SPP region, with SPP members, and between regions. It is clear that the development of emergency training around specific operating plans improves the operating plans by revealing weaknesses as they are practiced. In addition, Operator skills are also developed in the execution of those plans. It is imperative that the SPP and its members are able to show they have taken the steps necessary to prepare System Operators for infrequent and complex emergency operating conditions. If the region is faced with recovering from or managing a severe electrical operating condition, SPP Operators and its members should be proficient in their duties and adequately trained.

The most viable regional training solution for providing SPP regional training will be one that utilizes an agreed-upon vendor to provide the basic curriculum and SPP training staff to design, develop and implement regional-specific emergency operations training, systems training, and restoration drills.

Vendor-Provided Coursework:
SPP training staff will work with the OTWG to identify and prioritize a training curriculum from fundamentals to more advanced scenario-based courses. SPP will recommend the basic curriculum (suite of training), but will not design or deliver the basic curriculum that can be provided by various vendors.

The coursework that falls into the vendor-provided category would be:
   A) Core Fundamentals
   B) NERC Standards
   C) System Protection
   D) NERC Certification

Exhibit A provides curriculum detail

SPP FTE Responsibilities:
The regional-specific emergency operations, systems training, and restoration drills will consist of simulated operations events, using EMS displays. Several scenarios will be created with variances in complexity. Systems training will cover topics based upon scenarios that will be seen by operators on a more regular basis. If there are vendor-provided materials that could be infused into this part of the curriculum, SPP will utilize a vendor “partner” and offer standard curricula that have been tailored to the needs of the SPP region. Where it makes sense, SPP will utilize training staff to identify course requirements and design and deliver the courses. But where it is more resource effective, SPP will utilize the vendor to design and deliver the courses.

The coursework that SPP training staff will provide:
   A) Regionally-Oriented Emergency Operations and Systems Training
   B) Subregional and Regional Restoration Drills

Exhibit A provides curriculum detail
Recommendation for Increasing SPP Training Staff

Assumption:  1 FTE = 1800 hours

*Exhibit B* provides details on how the hours of design and development are calculated

Following is an overview of the number of FTEs needed to fulfill the SPP regional training proposal:

**SPP Training Staff Responsibilities for Regionally-Oriented Emergency Operations and Systems Training**

- These courses will be scenario-based, utilizing simulations
- SPP training staff will design and develop content and assessments for these courses
- Where appropriate, SPP training staff will develop online courses
- Where appropriate, SPP training staff will deliver sessions via net conference.
- This training series will require five (5) days of classroom training including instruction and lab-based/simulation training
- This training series will be delivered two times per year
- SPP training staff will design and develop online workbook exercises- the workbook exercises will be designed to reinforce the classroom experience and prepare the participant for the exam(s)
- SPP will design and develop exams that will be for participants online
- SPP training staff will act as a clearinghouse for operator access to all coursework (Vendor and SPP-provided)
- SPP training staff will coordinate the pricing, availability and course delivery with the OTWG
- SPP training staff will submit NERC applications for all courses to be approved for CEH credit
- SPP training staff will track continuing education credits
- SPP training staff will offer this series four times per year

**FTE Calculation**

One 8-hour day of scenario-based training utilizing simulations will require approximately 6.5 weeks of design and development time.

- 3 days training x 6.5 weeks of design and development time = 19.5 weeks or 780 hours
- Delivery, modification, and maintenance of units = 6 weeks or 240 hours
- 2 hours of online workbook exercises = 4 weeks or 168 hours
- Maintenance of online content = 4 weeks or 168 hours
- Administrative Duties
  - Due to the expanded role that SPP training staff will play in administering this suite of training, a higher percentage was used in this calculation.

Subtotal FTE = 1996 hours or approximately 1.1 FTE
SPP Training Staff Responsibilities for Sub-regional and Regional Restoration Drills

- These courses will be scenario-based, utilizing simulations
- SPP training staff, working in partnership with our members, will design and develop content and assessments for these restoration drills
- SPP training staff will partner with designated individuals from each region to conduct the drills
- SPP training staff will conduct one restoration drill per year in each of the four sub-regions; the drill will be conducted over a one-day period
- SPP training staff will conduct two regional restoration drills per year; the drills will be conducted over a one-day period
- SPP training staff will submit NERC applications for these events
- SPP training staff will track continuing education credits earned through participation in the drills
- SPP training staff will partner with SPP engineers to ensure seamless integration of the simulator into each drill
- SPP training staff will partner with SPP engineers to run meaningful, appropriate scenarios

FTE Calculation

One 8-hour day of scenario-based training utilizing simulations will require approximately 6.5 weeks of design and development time.

Sub-regional Drills = 1 day x 6.5 weeks of design and development time
                    = 6.5 weeks or 260 hours

Regional Drills    = 1 day x 6.5 weeks of design and development time
                    = 6.5 weeks or 260 hours

Delivery, modification, & maintenance of drills = 10 weeks or 400 hours

Administrative Duties = 8 weeks or 320 hours

Subtotal FTE = 1240 hours or 0.70 FTE

1.10 FTE (Regional-specific Training)
0.70 FTE (Sub-regional and Regional Restorations Drills)

Total FTEs = 1.80 FTE
I. VENDOR-PROVIDED

A. Core Curriculum
   1. Ohms Law, Power & Energy Formulas
   2. Basic Concepts of Series and Parallel Circuits
   3. Formulas for Voltage/Current Division
   4. Inductance, Capacitance, Phase angle, and Power angle, Angle Stability
   5. Vector Diagrams
   6. Electromagnetism, Induction, Transformers and Conductors
   7. Generators
   8. Torque Angle and Synchronizing

B. NERC Standards
   1. Balancing, Resource and Demand
   2. Communications
   3. Critical Infrastructures Protection
   4. Emergency Preparedness and Operations
   5. Interchange Scheduling and Coordination
   6. Interconnection Reliability Operations and Coordination
   7. Personnel Performance, Training, and Qualification
   8. Protection and Control
   9. Transmission Operations
   10. Voltage and Reactive Control

C. System Protection
   1. Intro to SP & Protective Relays Introduction to System Protection and Protective Relays
   5. Distribution Underfrequency Relays, Capacitor Banks, et. al Distribution: Underfrequency Relays, Capacitor Bank and Feeder Protection
   7. Distance Relays, Directional & Zone Relays, et. al Distance Relays, Directional and Zone Relaying, Carrier Phase Line Relays and Ground Relays
   10. Transmission Relay Functionals, et. al Transmission Relay Functionals including Line, Bus, and Transformer
   11. Panel Layouts Panel Layouts including Line, Tie Breaker, Bus Differential and Transformer Bank
   12. Generator Protection Generator Protection
D. NERC Certification
1. An Introduction to NERC 2006 Certification
2. Balancing Resource and Demand
3. Critical Infrastructure Protection
4. Communications
5. Emergency Preparedness and Operations
6. Interchange Scheduling and Coordination
7. Interconnection Reliability Operations and Coordination
8. Personnel Performance, Training, and Qualification
9. Protection and Control
10. Transmission Operations
11. Voltage and Reactive Control

II. SPP TRAINING STAFF

A. Emergency Operations and Systems Training
1. Simulated regional scenarios with all members across SPP
2. Transmission Loading Relief and Congestion Management
3. Energy Emergency Alert and Other Extreme Conditions
4. Reserve Sharing System (RSS)
5. Voltage Control, system stability (regionally oriented)
6. SPP procedures, structure, groups, and operations areas
7. Interconnected power system operations, energy shortages
8. Interconnect Reliability Operating Limit - system operator response, SPP Reliability Coordinator response

B. Restoration Drills
Restoration drills will emphasize system recovery during simulated blackouts ranging from outage pocket(s), to larger interconnect-wide outages. Principles of restoration will be discussed, but the drills will focus on outage recovery and the communications required for inter- and intra-regional coordination. SPP will design, develop, and coordinate four sub-regional restoration drills per year and two Regional drills at SPP. SPP will work with the OTWG and the Restoration training subcommittee to ensure that the drills are meeting their requirements.
DETERMINING HOURS OF DESIGN AND DEVELOPMENT

Overview

A general rule of thumb can be used to determine the amount of time it takes to design, develop, implement, and evaluate training courses. The following is an example of the calculation of time needed for the design and development of seven different types of courses. Note: This does not include delivery times. Delivery time will be established based on the requirements of and amount of participation among SPP members. Calculations are based on modified curriculum development guidelines from Weber State University and the American Society for Training and Development (ASTD).

1. **Information-Only Courses** (e.g., presentations)
   For every hour of informational training, it is necessary to spend approximately eight hours of development for each hour of the class. Because it is information only, it does not require a complicated development process. A complexity factor of “1” should be used if the course is information and the evaluation is a simple objective assessment (e.g., Multiple Choice).

   In this instance, an 8-hour information-only course with an objective assessment will require:
   \[
   8 \text{ hours (course length)} \times 8 \text{ hours (development time)} \times 1 \text{ (complexity factor)} = 64 \text{ hrs}
   \]
   So for a one-day, information-only class with objective assessments, it will take approximately 1.5 uninterrupted weeks to design and develop content and assessments. *This does not include delivery time.*

2. **Activity-Based Courses** (e.g., workbooks/worksheets, tabletop exercises)
   For every hour of activity-based training, it is necessary to spend approximately eight hours of development for each hour of the class. Because it is activity-based, it requires a more complicated development process. A complexity factor of “2” should be used if the course is activity-based and the evaluation is a simple objective assessment (e.g., Multiple Choice) or a written problem-based assessment.

   In this instance, an 8-hour activity-based course with an objective assessment will require:
   \[
   8 \text{ hours (course length)} \times 8 \text{ hours (development time)} \times 2 \text{ (complexity factor)} = 128 \text{ hrs}
   \]
   So for a one-day, activity-based class with objective assessments, it will take approximately 3 uninterrupted weeks to design and develop content and assessments. *This does not include delivery time.*

3. **Scenario-Based Courses** (this might include the use of a simulator)
   For every hour of hands-on, performance-based training, it is necessary to spend approximately eight hours of development for each hour of the class. Because it is performance-based, it also requires additional time for developing performance-based assessments. A complexity factor of “3” should be used if the course and evaluation are hands-on. If a simulator is used, this will require additional time and coordination.

   In this instance, an 8-hour performance-base course with performance-based assessments will require:
   \[
   8 \text{ hours (course length)} \times 8 \text{ hours (development time)} \times 3 \text{ (complexity factor)} = 192 \text{ hrs}
   \]
   So for a one-day, hands-on class with performance-based assessments, it will take approximately 5 uninterrupted weeks to design and develop content and assessments. *This does not include delivery time.*
4. **Simulator-based** - an 8 hour performance-based, scenario-based course with performance-based assessments will require:

\[ 8 \text{ hours (course length)} \times 8 \text{ hours (development time)} \times 4 \text{ (complexity factor)} = 256 \text{ hrs} \]

So for a one-day, hands-on, simulator-based class with performance-based assessments, it will take approximately 6.5 uninterrupted weeks to design and develop content and assessments. *This does not include delivery time.*

5. **Vendor-Provided Courses**

If any of these courses are offered by a vendor, it reduces the amount of time required of the SPP training staff. A good rule of thumb for vendor-provided training is to use the following:

\[ 8 \text{ hours (course length)} \times 0.5 \text{ (complexity factor)} = 4 \text{ hrs} \]

So for a one-day, vendor-provided class, it will take approximately ½ day of an SPP training staff member.

6. **Vendor-Partner Courses**

If any of these courses are offered by a vendor and SPP training staff is asked to partner with the vendor in the design and development process, it reduces the amount of time required of the SPP training staff, but still requires more than a course that is solely vendor-provided. A good rule of thumb for training developed in partnership with a vendor is:

\[ 8 \text{ hours (course length)} \times 1.5 \text{ (complexity factor)} = 12 \text{ hrs} \]

So for a one-day, vendor-partner class, it will take approximately 1.5 days of an SPP training staff member. *This does not include delivery time.*

7. **Online Courses** (courses created using FLASH, CAPTIVATE, or other MACROMEDIA products that are animated and interactive)

Due to the nature of these courses, the design and development calculations are different than those above.

For a one-hour, online, interactive course, the following metrics apply:

- 40 hours research and development of data for course
- 40 hours script writing
- 40 hours Flash animation development
- 40 hours Captivate development and editing
- 8 hours audio recording
- **168 Total Hours** or approximately 4 weeks of design and development time

So for a one-hour, online, interactive course, it will take approximately four weeks to design and develop content and assessments.
Exhibit C

SUPPORTING DOCUMENTATION

Following are excerpts from NERC Standards, SPP Criteria, the 2005 SPP Reliability Readiness Audit Report, and the Blackout Report relating to training.

**NERC Standard** EOP-005-1 requirement R6:

R6. Each Transmission Operator and Balancing Authority shall train its operating personnel in the implementation of the restoration plan. Such training shall include simulated exercises, if practicable.

**NERC Standard** requires:

1.4.3 Documentation must be retained in the personnel training records that operating personnel have been trained annually in the implementation of the plan and have participated in restoration exercises.

**NERC Standard** EOP-008-0 requirement R1.6:

Requires Transmission Operators, Balancing Authorities, and Reliability Coordinators to “have a plan to continue reliability operations in the event its control center becomes inoperable.”,

and:

R1.6. The plan shall include procedures and responsibilities for providing annual training to ensure that operating personnel are able to implement the contingency plans.

**NERC Standard** PER-004-0 requires:

“R4. Reliability Coordinator operating personnel shall have an extensive understanding of the Balancing Authorities, Transmission Operators, and Generation Operators within the Reliability Coordinator Area, including the operating staff, operating practices and procedures, restoration priorities and objectives, outage plans, equipment capabilities, and operational restrictions.”

The above requires SPP Reliability Coordinators to be knowledgeable of members’ operating procedures, restoration priorities, and personnel. Regional training provides the necessary exposure and facilitates communication between members and SPP operations and training personnel.

**SPP Criteria 9.1.1** requires:

“Balancing Authorities and Transmission Operators shall train appropriate personnel in the implementation and execution of their black start plan.”

**SPP Criteria 9.2** suggests that the black start plan of each Balancing Authority and Transmission Authority contain:

“g. Provisions for training and documentation of training for personnel”

**SPP Criteria 10.1** requires:

“The Reliability Authority shall instigate and monitor this testing and training process” in regard to SPP Emergency Communication

**2005 SPP Reliability Readiness Audit Report** Recommendation #8:

8. Involve all the control areas in the reliability region in restoration drills and training. (Section 6, 15)
Final Report on the August 14, 2003 Blackout in the United States and Canada dealing with training:

19. Improve near-term and long-term training and certification requirements for operators, reliability coordinators, and operations support staff. In its requirements of February 10, 2004, NERC directed that all reliability coordinators, control areas, and transmission operators are to provide at least five days per year of training and drills in system emergencies, using realistic simulations, for each staff person with responsibility for the real-time operation or reliability monitoring of the bulk electric system. This system emergency training is in addition to other training requirements. Five days of system emergency training and drills are to be completed by June 30, 2004. The Task Force supports these near-term requirements strongly.

For the long term, the Task Force recommends that:
A. NERC should require training for the planning staff at control areas and reliability coordinators concerning power system characteristics and load, VAr, and voltage limits, to enable them to develop rules for operating staff to follow.
B. NERC should require control areas and reliability coordinators to train grid operators, IT support personnel, and their supervisors to recognize and respond to abnormal automation system activity.
C. NERC should commission an advisory report by an independent panel to address a wide range of issues concerning reliability training programs and certification requirements.
## Exhibit D

### CURRENT SPP STAFF USAGE

<table>
<thead>
<tr>
<th>Date</th>
<th>Projects (PTE in 1000 hrs)</th>
<th>Description</th>
<th>Course Type</th>
<th>PTE</th>
<th>Hours Per Year</th>
<th>% of PTE</th>
<th>Total Project Hours by Position</th>
<th>Total Administrative</th>
<th>Total PTE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Spring 07 (Weekend)</td>
<td>Spring Operations Conference</td>
<td>1 session = 4 days of training</td>
<td>In-house/甲方/Partner</td>
<td>1</td>
<td>120</td>
<td>6.67%</td>
<td>1,200</td>
<td>270</td>
<td>1,470</td>
</tr>
<tr>
<td>Spring Yearly</td>
<td>Out</td>
<td>Information available</td>
<td>In-house/甲方/Partner</td>
<td>1</td>
<td>340</td>
<td>18.38%</td>
<td>3,400</td>
<td>910</td>
<td>4,310</td>
</tr>
<tr>
<td>Ongoing</td>
<td>Job Task Analysis</td>
<td>Designing technical managers job requirements, develops OJT Guides, teaches NERC Certification and relevance to work</td>
<td>N/A</td>
<td>1</td>
<td>230</td>
<td>11.59%</td>
<td>2,300</td>
<td>610</td>
<td>2,910</td>
</tr>
<tr>
<td>Ongoing</td>
<td>Out</td>
<td>Training in the SPP Control Center two days a week</td>
<td>N/A</td>
<td>1</td>
<td>550</td>
<td>23.03%</td>
<td>5,500</td>
<td>1,450</td>
<td>6,950</td>
</tr>
<tr>
<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>Information Scenario</td>
<td>Information Scenario</td>
<td>1</td>
<td>480</td>
<td>22.67%</td>
<td>4,800</td>
<td>1,270</td>
<td>6,070</td>
</tr>
<tr>
<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>Information Scenario</td>
<td>Information Scenario</td>
<td>1</td>
<td>480</td>
<td>22.67%</td>
<td>4,800</td>
<td>1,270</td>
<td>6,070</td>
</tr>
<tr>
<td>Ongoing Yearly</td>
<td>Orientation Tours</td>
<td>Training new employees through the control center</td>
<td>Information-only</td>
<td>1</td>
<td>130</td>
<td>6.03%</td>
<td>1,300</td>
<td>330</td>
<td>1,630</td>
</tr>
<tr>
<td>Late September 05</td>
<td>SPP Market Operations Training</td>
<td>Scenario-based training for SPP market operators</td>
<td>Scenario</td>
<td>1</td>
<td>650</td>
<td>31.59%</td>
<td>6,500</td>
<td>1,720</td>
<td>8,220</td>
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<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>SPP Training for new coordination - 5 days a week for new employees</td>
<td>Information Scenario</td>
<td>1</td>
<td>480</td>
<td>22.67%</td>
<td>4,800</td>
<td>1,270</td>
<td>6,070</td>
</tr>
<tr>
<td>Ongoing</td>
<td>Out</td>
<td>Training in the SPP Control Center two days a week</td>
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<td>1</td>
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<td>23.03%</td>
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<td>6,950</td>
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<td>Information Scenario</td>
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<td>22.67%</td>
<td>4,800</td>
<td>1,270</td>
<td>6,070</td>
</tr>
<tr>
<td>Ongoing</td>
<td>Task Analysis</td>
<td>System test that manages job requirements, develops OJT guides, teaches NERC Certification and relevance to work</td>
<td>N/A</td>
<td>1</td>
<td>230</td>
<td>11.59%</td>
<td>2,300</td>
<td>610</td>
<td>2,910</td>
</tr>
<tr>
<td>January - October 06</td>
<td>ICT Project</td>
<td>Establishes System Strategy for setting objectives, content, development, and evaluation</td>
<td>Vendor/甲方/Partner</td>
<td>3</td>
<td>240</td>
<td>13.55%</td>
<td>2,160</td>
<td>570</td>
<td>2,730</td>
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<td>Ongoing Yearly</td>
<td>NERC Training</td>
<td>0 hours (1/2 of time on NERC/other activities)</td>
<td>N/A</td>
<td>3</td>
<td>630</td>
<td>35.00%</td>
<td>3,150</td>
<td>835</td>
<td>3,985</td>
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<td>Ongoing Yearly</td>
<td>Continuing Education for Operations</td>
<td>SPP Training for new coordinator - 3 days a week for new employees</td>
<td>Information Scenario</td>
<td>3</td>
<td>480</td>
<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
</tr>
<tr>
<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>SPP Training for new coordinator - 3 days a week for new employees</td>
<td>Information Scenario</td>
<td>3</td>
<td>480</td>
<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
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<tr>
<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>SPP Training for new coordinator - 3 days a week for new employees</td>
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<td>24.00%</td>
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<td>1,810</td>
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<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
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<td>480</td>
<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
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<tr>
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<td>Information Scenario</td>
<td>3</td>
<td>480</td>
<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
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<tr>
<td>Ongoing Yearly</td>
<td>New Coordinator Training</td>
<td>SPP Training for new coordinator - 3 days a week for new employees</td>
<td>Information Scenario</td>
<td>3</td>
<td>480</td>
<td>24.00%</td>
<td>1,440</td>
<td>370</td>
<td>1,810</td>
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<td>June - September and October 07</td>
<td>Regional Market Hot Topics</td>
<td>Training on 4 to 5 day course (offsite)</td>
<td>Information-only</td>
<td>5</td>
<td>60</td>
<td>3.03%</td>
<td>300</td>
<td>75</td>
<td>375</td>
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<tr>
<td>October 06 - January 17</td>
<td>Regional Fast Track Market Sessions</td>
<td>Both in-person and offsite meetings</td>
<td>Information and Scenario</td>
<td>5</td>
<td>640</td>
<td>32.00%</td>
<td>3,200</td>
<td>850</td>
<td>4,050</td>
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<tr>
<td>November/December 06</td>
<td>New Market Development</td>
<td>New market development</td>
<td>Information-only</td>
<td>5</td>
<td>150</td>
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<td>750</td>
<td>190</td>
<td>940</td>
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<td>December 06 - January 07</td>
<td>One-on-One Sessions</td>
<td>Training for new coordinator - 3 days a week for new employees</td>
<td>Information-only</td>
<td>5</td>
<td>80</td>
<td>4.00%</td>
<td>400</td>
<td>100</td>
<td>500</td>
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<td>Ongoing Yearly</td>
<td>Managerial duties</td>
<td>Managerial duties</td>
<td>N/A</td>
<td>5</td>
<td>1050</td>
<td>52.60%</td>
<td>5,280</td>
<td>1,320</td>
<td>6,600</td>
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<td>Ongoing Yearly</td>
<td>New support</td>
<td>New support for new coordinator - 3 days a week</td>
<td>N/A</td>
<td>6</td>
<td>375</td>
<td>19.03%</td>
<td>2,250</td>
<td>590</td>
<td>2,840</td>
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<tr>
<td>Ongoing Yearly</td>
<td>Regional On-line Training</td>
<td>Consists of 5 regional operations courses</td>
<td>Information-only</td>
<td>6</td>
<td>840</td>
<td>42.00%</td>
<td>5,040</td>
<td>1,360</td>
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<tr>
<td>Ongoing Yearly</td>
<td>Regional On-line Training</td>
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<td>840</td>
<td>42.00%</td>
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<td><strong>TOTALS</strong></td>
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<th>Status</th>
<th>Regional (PTE = 1000 hrs)</th>
<th>Description</th>
<th>Course Type</th>
<th>PTE</th>
<th>Hours Per Year</th>
<th>% of PTE</th>
<th>Total Project Hours by Position</th>
<th>Total Administrative</th>
<th>Total PTE</th>
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<tbody>
<tr>
<td>Ongoing Yearly</td>
<td>Regionally-coordinated Emergency Operations &amp; Systems Training</td>
<td>2 sessions @ 2 days each for new employees</td>
<td>Simulation-based</td>
<td>3</td>
<td>1500</td>
<td>75.00%</td>
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<tr>
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<td>Non-region &amp; Regional Restoration Training</td>
<td>2 sessions @ 2 days each for new employees</td>
<td>Simulation-based</td>
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<td>1500</td>
<td>75.00%</td>
<td>4,500</td>
<td>1,125</td>
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<td><strong>TOTAL</strong></td>
<td></td>
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